Blythe Energy LLC
700 Universe Boulevard
Juno Beach, Florida 33408

April 13, 2007

Mr. Steve Munro
Compliance Project Manager
Energy Facilities Siting and Environmental Protection Division
California Energy Commission
1516 9th Street, MS 2000
Sacramento, CA 95814

RE: Blythe Energy Transmission Project Request for Approval of Insignificant Change

Dear Steve:

Enclosed for your review is a Request for Approval of Insignificant Change for the Blythe Energy Transmission Project. The enclosed request addresses the items brought to the CEC staff's attention at the pre-application meeting on March 28. Additional revisions from that presented at the meeting have been made to the description of the Blythe-Julian Hinds transmission line alignment just south of the Interstate 10 freeway near Blythe to further reduce impacts to the ongoing citrus orchard and grape vineyard operations. Blythe Energy and its contractors have discussed the revised transmission line alignment in the area of the Blythe facility with representatives of the City of Blythe.

It is our position that no modifications are required to the Blythe Energy Project AFC license conditions of certification, as amended, to accommodate the proposed insignificant changes described in the enclosed application. We, therefore, anticipate that this request can be approved expeditiously such that we can continue to move our project development activities forward in a timely manner.

We are also enclosing with this application, a copy of the final interconnection approval issued by the California Independent System Operator (CAISO) for the interconnection of the modified Blythe facility to Julian Hinds transmission line component to the Julian Hinds substation. A copy of the final Facilities Study for this modified transmission line component is also enclosed, and Blythe Energy requests that the entire study report be treated as confidential information.

Since our pre-application meeting with you, we are pleased to announce that the Bureau of Land Management (BLM) and Western Area Power Administration have approved a Finding of No Significant Impact for the Blythe Transmission Project. A Record of

Decision has also been issued by BLM, and both of these documents are available on the BLM Palm Springs South Coast Field Office web site.

We appreciate the CEC staff's cooperation and comments during the pre-application meeting and look forward to addressing any questions the staff has on the proposed revisions. Please contact me directly at 949-721-1554, or by email at gary_l_palo@fpl.com if you have any questions on the status of the project or the purpose of this filing. Technical questions should be addressed to Dwight Mudry at 949-388-3612 or by email to dwight.mudry@cox.net.

Regards,

Gary L. Palo
Project Director
Blythe Energy LLC
6 Belcourt Drive
Newport Beach, CA 92660

cc: John Goodwin – Blythe Energy
Kenneth Stein – FPL Energy
Scott Galati – Galati & Blek LLP

BLYTHE POWER PROJECT

Request for Approval of Insignificant Project Change (99-AFC-8)

Blythe Transmission Line

Minor Route Realignment and Relocated Connection to the Blythe Power Plant

Submitted to:

California Energy Commission
Sacramento, California

Prepared by:

Blythe Energy, LLC

With Assistance of:

Tetra Tech EC, Inc.
and
Environmental & GIS Services, LLC

April 13, 2007

Contents

Appendices

Figures

1.0 Introduction

Blythe Energy, LLC (Blythe Energy as the petitioner) hereby requests approval of insignificant project changes to the Blythe Energy Project (Project or BEP). In accordance with Section 1769(a)(2) of the CEC Siting Regulations, the proposed changes do not have the potential to have a significant effect on the environment and would not result in the change or deletion of a condition adopted by the California Energy Commission (CEC) or cause the project not to comply with applicable laws ordinances, regulations or standards (LORS).

Blythe Energy is the owner of the BEP, a 520-megawatt (MW) combined cycle natural gas-fired electric-generating facility. The BEP is located in the City of Blythe, California, just north of Interstate 10 approximately 7 miles east of the California and Arizona border. The Project is directly connected to the Buck Boulevard Substation (Buck Substation) owned by the Western Area Power Administration (Western), which in turn is connected to the Blythe Substation and the Southern California Edison Company (SCE) transmission system.

In 2006 the CEC approved (10/11/06, CEC Notice of Decision) an amendment to the BEP license (99-AFC-8C) for the construction and operation of a 230 kV transmission line (Blythe Transmission Line) to allow for delivery of the full BEP electrical output to the California Independent System Operator (CAISO)-controlled electrical transmission system. Western and the Bureau of Land Management (BLM) served as co-lead federal agencies for review of the Blythe Energy petition pursuant to the National Environmental Policy Act and have issued a Finding of No Significant Impact (FONSI) for the license amendment (Western & BLM. 2007).

Blythe Energy hereby requests approval of the following insignificant project changes to the Blythe Transmission Line:

- Modified interconnection from Buck Boulevard Substation to new BEP switchyard;
- Alternate transmission line route realignment from milepost 0.0 to milepost 3.0; and,
- Minor adjustments to pole locations from milepost 6.5 to 62.1

In accordance with Section 1769 of the CEC Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes), this request for approval of insignificant project change presents the necessity for the proposed modifications, a description of the proposed modifications, and an analysis of potential impacts on the environment, nearby property owners and the general public. This petition also outlines the Project's continued ability to comply with applicable laws, ordinances, regulations and standards during construction and upon placing the modifications in service and demonstrates that the proposed modifications will not result in significant environmental impacts. No changes to or deletions of any of the Conditions of Certification are necessary as a result of the proposed modifications.

The information necessary to fulfill the requirements of Section 1769 is provided in the following sections:

2.0 Description of Project Changes
3.0 Necessity for the Proposed Changes
4.0 Changes are Required Based on New Information
5.0 Environmental Analysis
6.0 Ability to Comply with LORS
7.0 Potential Effect on Public
8.0 List of Property Owners
9.0 Potential Effect on Property Owners
10. References

2.0 Description of Project Changes

2.1 Connection to the Blythe Power Plant

The three existing generator step-up (GSU) transformers at the Blythe Power Plant are currently energized at 161kV high side voltage and are connected to the WAPA owned Buck Substation. As part of the proposed modifications described above, the transformer high side voltage will be changed to 230kV and the current connection to the Buck Substation will be removed. Three new 230kV underground circuits will be installed from the existing GSU transformers over to a new 230kV gas-insulated switchyard that will be located on the south side of the Buck Substation in an already disturbed/graveled area (Figure 2-1). At the two existing combustion turbine generators (CTG) GSU transformer bays, the existing "A"-frame dead-end will be removed and a new "H"-frame will be installed to facilitate the connection to the 230kV underground terminations. At the steam turbine generator (STG) GSU transformer bay, a new H-frame tower will be installed and used in conjunction with the existing A-frame dead-end to facilitate the connection to the 230kV underground terminations. The new 230kV circuits will be routed south up the access road and then east into the new switchyard that will be located between the main plant south side access road and the existing Buck Substation (see Figure 2-1). An elevation drawing of the new switchyard is shown in Figure 2-2.

The new 230kV switchyard will be configured as a four breaker ring bus; three positions will be used to bring in the circuits from the GSU's and the fourth position will be connected to a new 230kV overhead Blythe Energy transmission line.

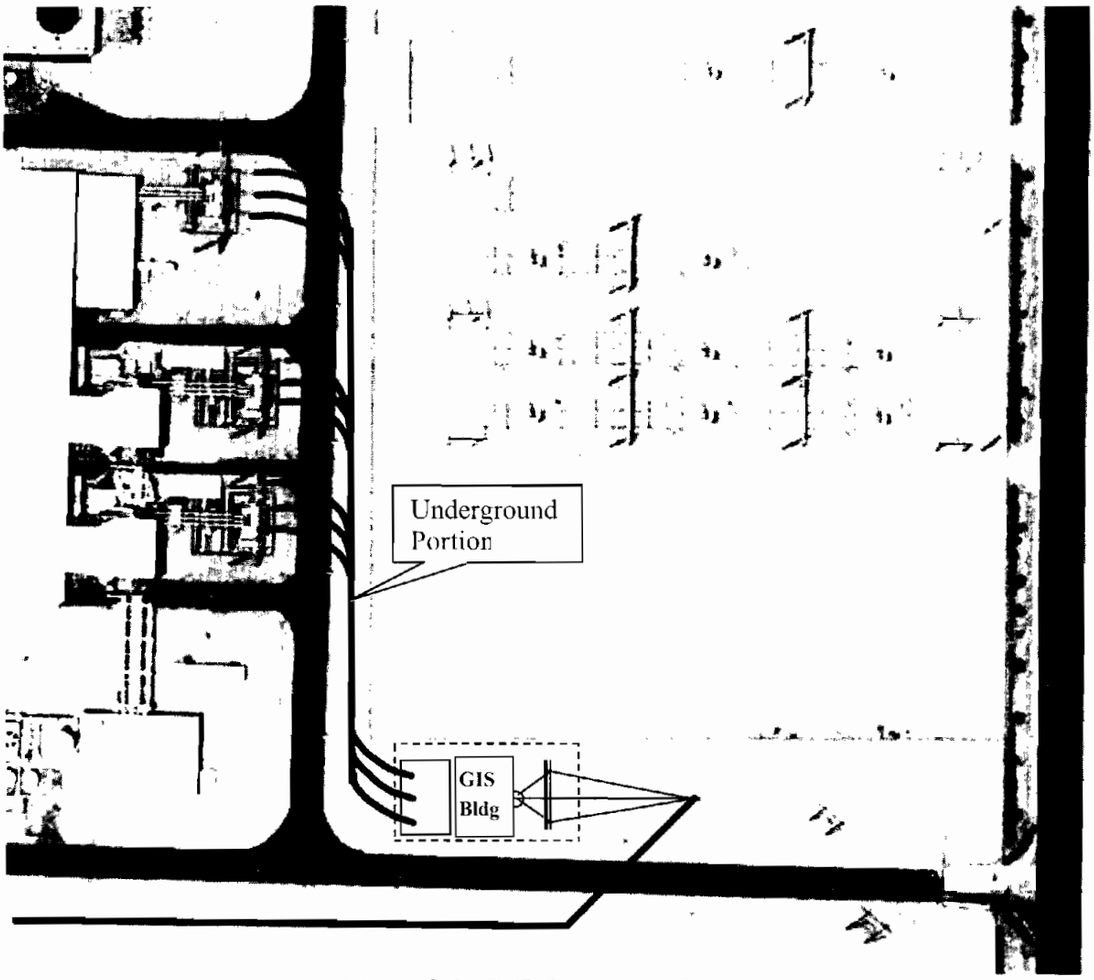


Figure 2-1. BEP Substation Layout

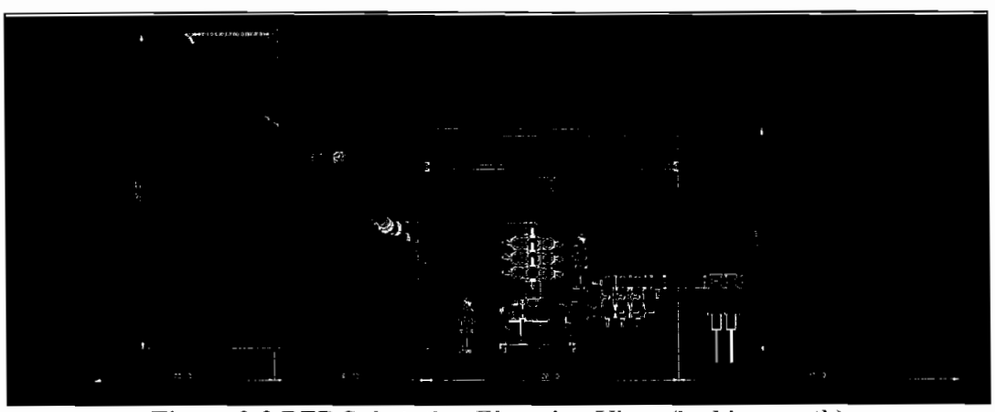


Figure 2-2 BEP Substation Elevation View (looking south)

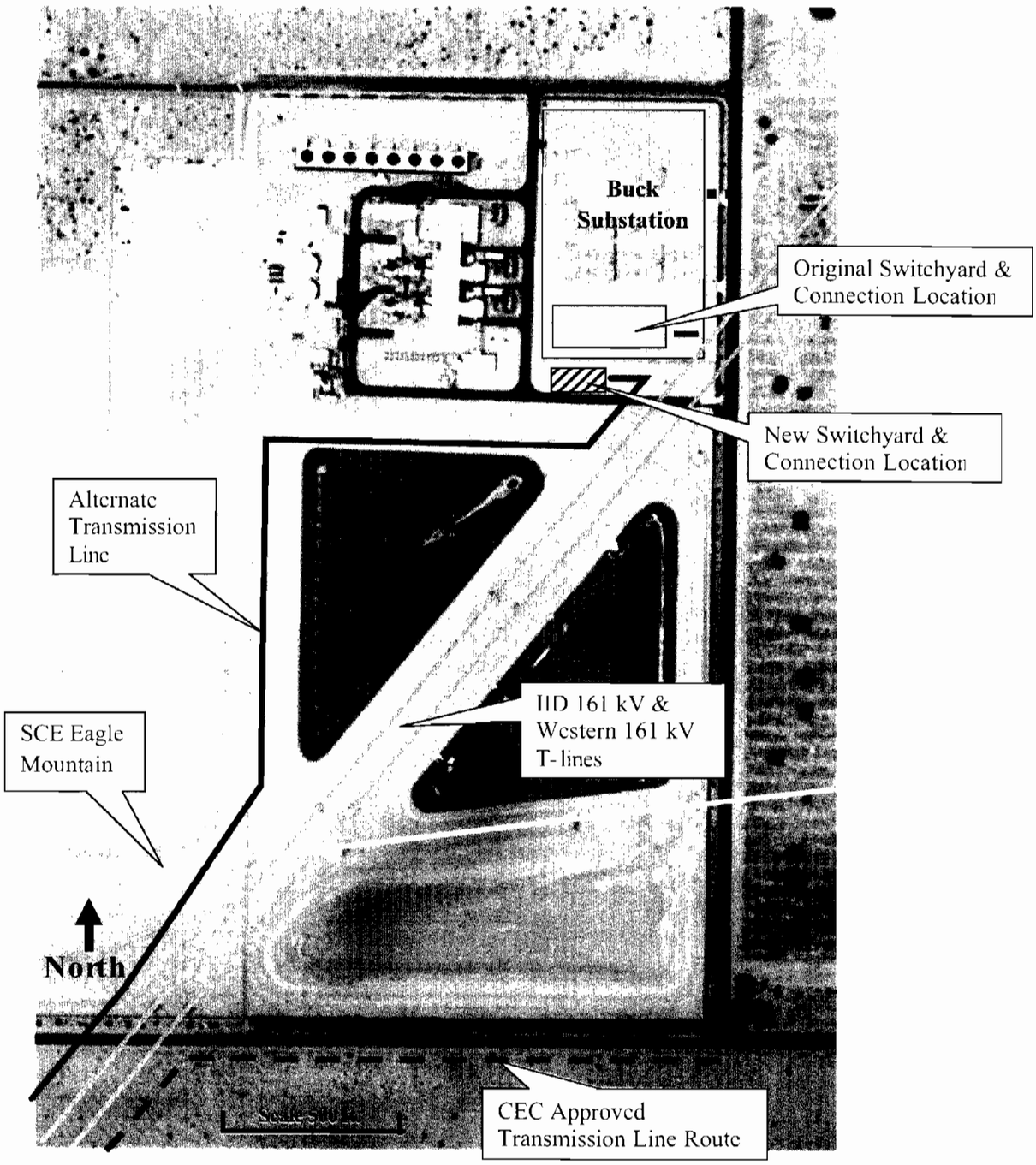


Figure 2-3. Alternate Transmission Line Connection to BEP.

2.2 Alignment From Milepost 0.0 to 3.0

Figures 2-4 and 2-5 illustrate the original and proposed realignment from milepost 0.0 to 3.0. On BEP property, an alternate route connecting the new 230kV Blythe to Julian Hinds transmission line will be routed south from the switchyard, along the BEP western site boundary of the site following a route adjacent to the existing Western and IID transmission lines that cross the BEP site (see Figure 2-3). The approved route remains a possible option, depending on final engineering review. The realigned portion is from pole #1 to pole #25, a distance of approximately 3.0 miles. The realignment as proposed is adjacent to, and on the west side of, the existing IID and Western transmission lines along this portion of the route. South of pole #25, the realignment is the same as previously approved (CEC 2006). The approved transmission line alignment (Figures 2-4 and 2-5) crosses the existing Western Blythe-Knob and IID Blythe-Niland 161 kV transmission lines twice as well as crossing other lines close to the Buck Substation. Realignment of the transmission line using the proposed alternate route illustrated in Figure 2-3 will eliminate the crossings of the existing Western Blythe-Knob and IID Blythe-Niland 161 kV transmission lines and reduce the congestion of transmission lines immediately east of the Buck Substation. For this proposed alternative, two "H" frame structures will be required at pole locations # 6 and #7, (see Figure 2-4). Structures # 6 and 7 will be 120 feet tall.

South of I-10, the re-aligned route crosses lands previously cultivated with jojoba and agricultural lands used for a vineyard. Overall, the proposed realignment crosses approximately 4410 feet of agricultural lands (vineyard) in comparison with the 8134 feet of agricultural lands (citrus) crossed by the approved route.

2.3 Alignment from Milepost 6.5 to 60.2

Figure 2-6 is a schematic illustration of the proposed realignment of the route that is 35 feet north of the original route from milepost 6.5 to 60.2. This realignment is necessary because the adjacent SCE ROW varies in width when passing from private to BLM lands. Approximately 271 poles will have to be relocated including the following pole numbers: 51-191, 239-282, and 312-402.

3.0 Necessity for Proposed Changes

The Siting Regulations require a discussion of the necessity for the proposed revision to the BEP and whether the modification is based on information known by the petitioner during the certification proceeding (Title 20, CCR, Sections 1769 [a][1][B], and [C]). There was no information regarding the necessity for these changes known by the petitioner during the certification proceeding The necessity for the three changes is described below:

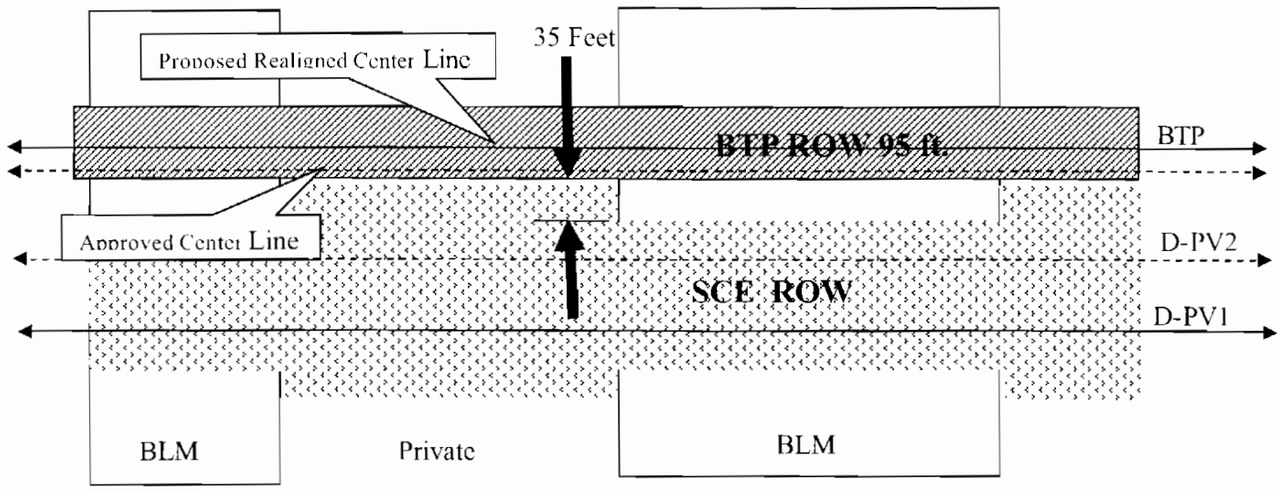


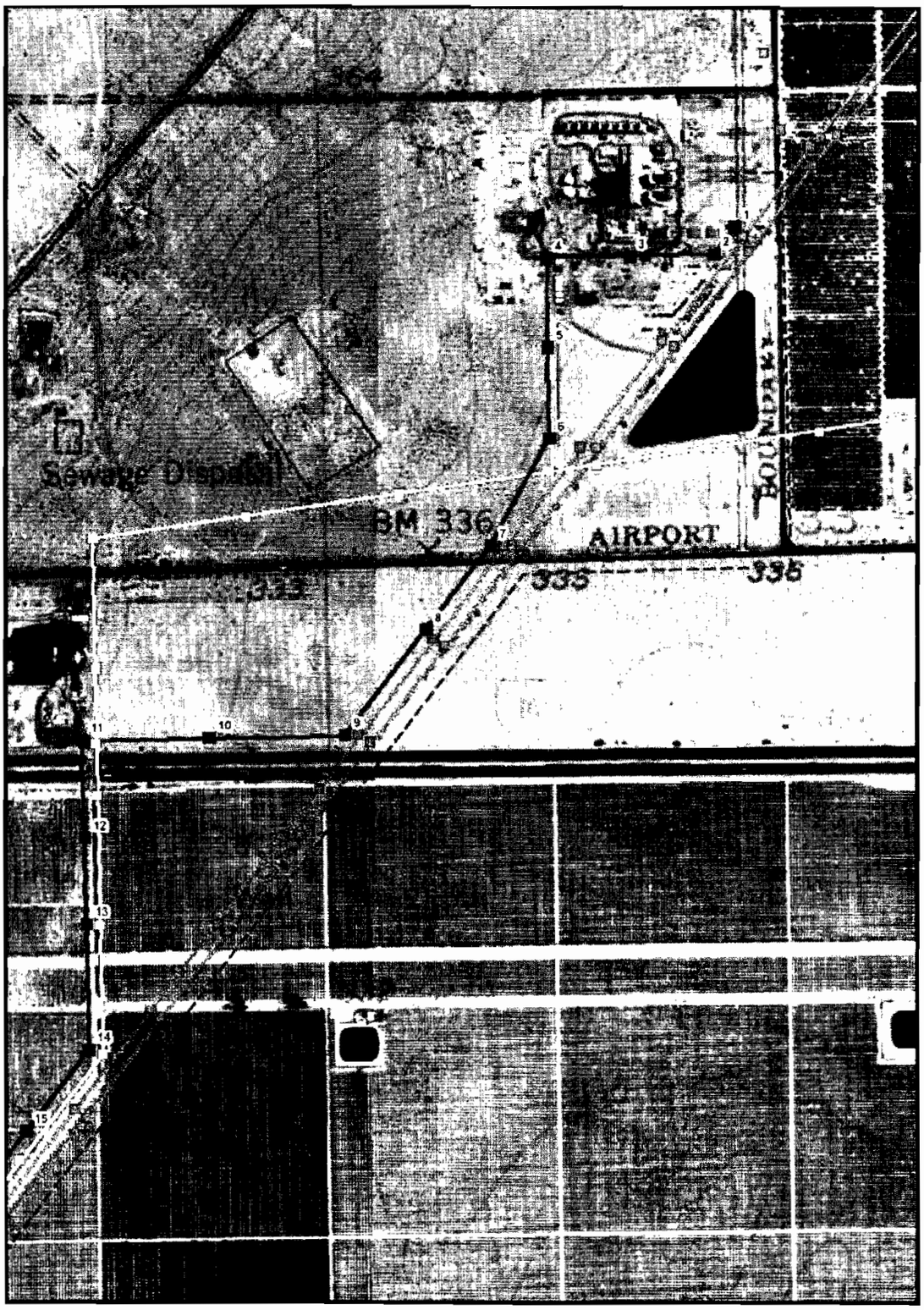
Figure 2-6. Location of BTP ROW relative to SCE ROW on BLM and Private Lands.

Connection to the Blythe Power Plant

During the SCE new generation resource solicitation process it was determined that the transmission line intertie with the Buck substation would classify the electric output from the BEP as an import under WECC procedures. This classification was not consistent with the solicitation requirement for CAISO continuous dispatch of the generation resource. Therefore, Blythe Energy is seeking CEC approval of the proposed modification to the Buck-Julian Hinds transmission component such that this component interconnection would be revised from the Buck Boulevard substation to a new switchyard to be built at the BEP site (Figure 2-3). The CAISO has granted approval of this modified interconnection subject to the successful completion of the identified upgrades and mitigation measures.

Alignment From Milepost 0.0 to 3.0

The approved transmission line alignment (Figures 2-4 and 2-5) has two crossings of the existing Western Blythe-Knob and IID Blythe-Niland 161 kV transmission lines as well as other crossings of lines close to the Buck Substation. Realignment of the transmission line as illustrated in Figures 2-4 and 2-5 will eliminate the crossings of the existing Western Blythe-Knob and IID Blythe-Niland 161 kV transmission lines and reduce the congestion of transmission lines immediately east of the Buck Substation. For the section of transmission line that is parallel to the existing Western Blythe-Knob and IID Blythe-Niland 161 kV transmission lines, the realignment consists of placement of the line on the west side of these two lines, rather than on the east side. In addition to fewer transmission line crossings, the revised alignment has been requested by the property owner and will minimize interference with the ongoing citrus grove activities and result in reduced impacts to agricultural lands located south of I-10. This change is needed to reduce impact to a portion of the citrus groves and to coordinate alignment with other existing and proposed (Blythe II) transmission lines.



Legend

- Proposed Blythe II Line Pole Locations
- Proposed Blythe II Line Alignment
- Approved Blythe I Line
- Eagle Mountain I Line
- IID WAPA T Lines

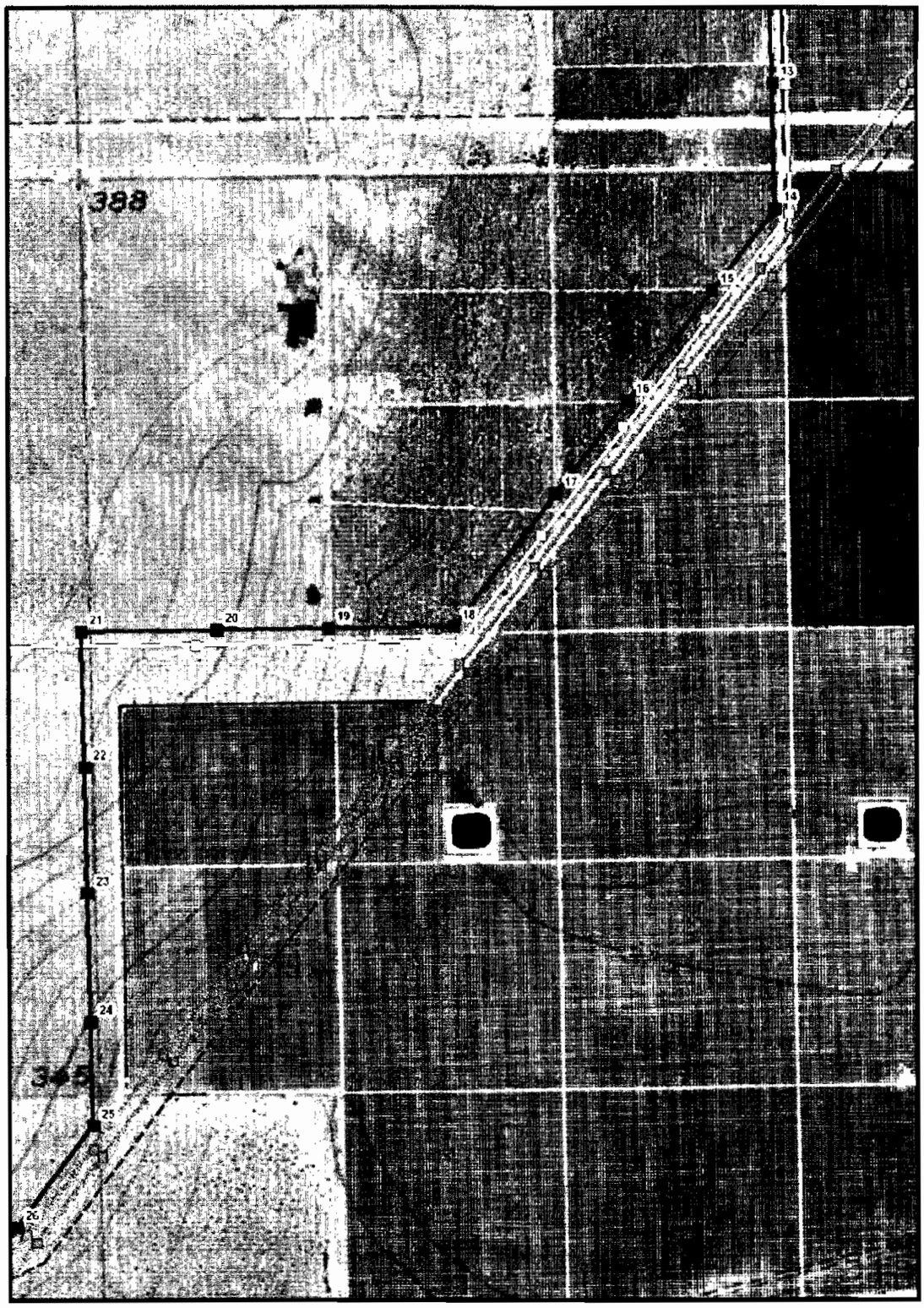
0 250 500 1,000 Feet

0 0.1 0.2 Miles

Blythe Energy Transmission Line

Blythe Energy, LLC

Figure 2-4 (Sheet 1 of 55)



Legend

- Proposed Blythe 1 Line Pole Locations
- Proposed Blythe 1 Line Alignment
- Approved Blythe 1 Line
- Eagle Mountain T Line
- IID-WAPA 1 Lines

0 250 500 1,000 Feet

N

0 0.1 0.2 Miles

Blythe Energy Transmission Line

Blythe Energy, LLC

Figure 2-5 (Sheet 2 of 55)

Minor adjustments to Pole Locations from Milepost 6.5 to 60.2
Adjustments to the pole locations from Milepost 6.5 to 60.2 are required where the alignment is adjacent to the SCE Devers Palo Verde 1 and 2 (DPV1 and DPV2). The SCE ROW varies in width when crossing BLM and private lands, a situation that was only recently discovered during the land acquisition process. In order for the BTP ROW to run straight on the north side of the SCE ROW when changing from private to BLM lands, the BTP ROW will be moved 35 feet north so that it is adjacent to the SCE ROW on private lands and 35 feet from the SCE ROW when on BLM lands. The new 95 foot ROW is within the corridor that was surveyed for biological, cultural, and other resources and no additional impacts are expected. Therefore the relocation of poles 35 feet to the north is considered a minor adjustment.

4.0 Changes are Required Based on New Information

Connection to the Blythe Power Plant
The Blythe Transmission Line project was conceived to deliver electric energy from the BEP to the Southern California Edison Company (SCE) transmission system through its interconnection at the Buck Boulevard Substation. The Project as approved included two transmission components, one which is to interconnect to the SCE high voltage electric transmission system at the Julian Hinds Substation, and a second component to be interconnected to the SCE existing 500 kV Devers-Palo Verde (DPV1) transmission line at a new substation location near Blythe referred to as Midpoint. The development of either or both of these transmission line components would enable Blythe Energy to deliver the full electric energy output of the BEP to the CAISO operated transmission system and ultimately to the electric load centers in Southern California.

In late 2006, Blythe Energy submitted a proposed offer for electric capacity and energy from the BEP in response to a competitive solicitation issued by SCE for long term power contracts to serve Southern California's growing energy needs. The solicitation was directed at new generating resources and/or existing generating resources that included the construction of new electric transmission lines to the CAISO system as part of their proposed offer. Blythe Energy, in its offer to SCE, proposed to deliver the electric energy to the Julian Hinds Substation interconnection point with the CAISO system through the CEC-approved Buck to Julian Hinds component of the Blythe Transmission Line Project. During the solicitation process it was determined that the new transmission line connection to the Buck substation would classify the electric output from the BEP as an import under WECC procedures. This classification was not consistent with the solicitation requirement to grant both SCE and the CAISO continuous dispatch of the generation resource. Therefore, Blythe Energy proposed that it disconnect from the Western substation and modify this transmission component to terminate at a new switchyard to be built at the BEP thereby creating a direct tie to the CAISO network. BEP requested that SCE finalize the Facilities Study reflecting this proposed modification, subject to the approval of the CAISO. On February 9, 2007, the CAISO issued its approval of the modification to the interconnection (see Appendix A). The revised CONFIDENTIAL Facilities Study, dated January 12, 2007, has been submitted under separate cover as Appendix B.

Blythe Energy's proposed offer was selected by SCE as a winning bid. A copy of the SCE press release announcing the results of the solicitation is included herein as Appendix C. As noticed, Blythe Energy received a 10-year Power Purchase Agreement (PPA) associated with energy produced by the BEP.

The PPA requires that Blythe Energy place the Blythe Transmission Line component as modified in service no later than August 1, 2010. It is Blythe energy's intent to initiate the necessary engineering, procurement and construction arrangements for the transmission line in 2008 and commence construction accordingly to achieve the PPA deadline.

Alignment From Milepost 0.0 to 3.0
During the land acquisition process, the revised alignment was requested by the property owner to minimize interference with the ongoing citrus grove activities.

Minor adjustments to Pole Locations from Milepost 6.5 to 60.2
Adjustments to the pole locations from Milepost 6.5 to 60.2 are required where the alignment is adjacent to the SCE Devers Palo Verde 1 and 2 (DPV1 and DPV2). The SCE ROW varies in width when crossing BLM and private lands, a situation that was only recently discovered during the land acquisition process.

5.0 Environmental Analysis of Proposed Project Change

5.1 Air Quality

Impacts to air quality from the project as modified with the proposed changes would be essentially the same as the impacts associated with the project as currently approved – e.g., similar construction equipment and O&M activities. Therefore, the proposed changes would not cause any new air quality impacts above and beyond those already identified and mitigated for in the existing CEC Decision and conditions of certification. No changes to or deletions of any air quality conditions of certification are required.

5.2 Biological Resources

Impacts to biological resources from the project as modified with the proposed changes would be essentially the same as the impacts associated with the project as currently approved. Therefore, the proposed changes would not cause any new biological resource impacts above and beyond those already identified and mitigated for in the existing CEC Decision and conditions of certification. No changes to or deletions of any biological resources conditions of certification are required.

BEP Substation/Connection to BEP
Like the approved Buck Substation location, the proposed switchyard is located in an already-disturbed, gravel-surfaced area (Figure 5-1) immediately adjacent to the Buck substation with no vegetation or natural habitat. The footprint of the new substation is approximately one-third the size of the footprint in the approved configuration.

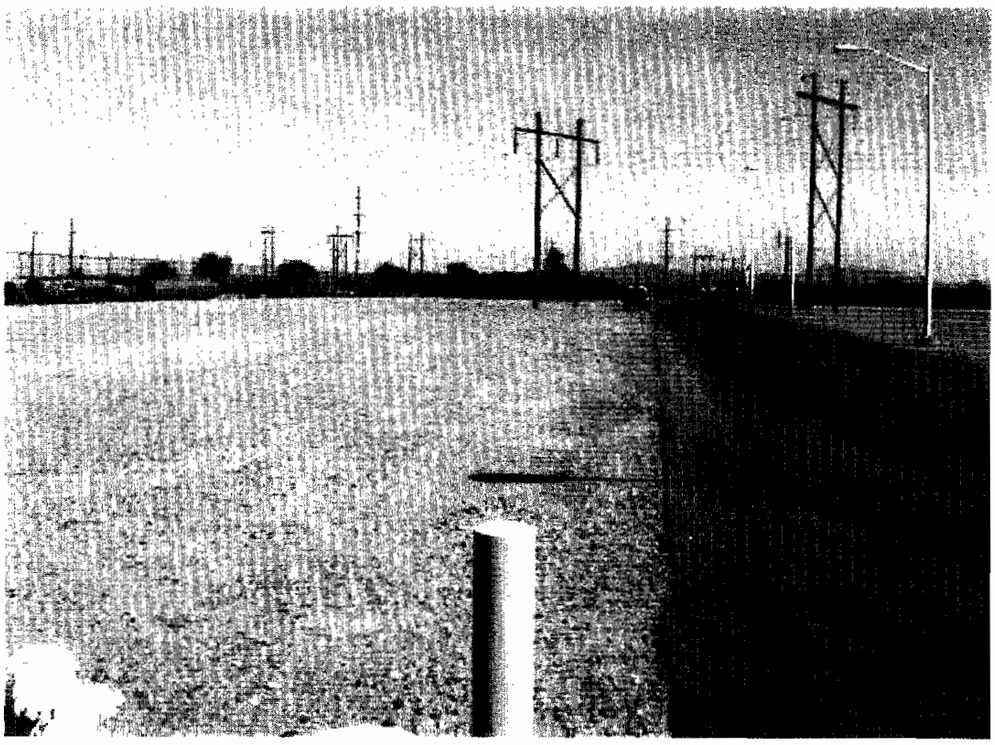


Figure 5-1. View looking east at the proposed switchyard location.

Alignment from Milepost 0.0 to 3.0

The proposed realignment is adjacent to, and on the west side of, the existing IID and Western transmission lines along a portion of the route. South of pole #25, the alignment is the same as previously approved (CEC 2006b). North of Hobson Way (see Figure 2-4), the transmission line is on BEP property that was disturbed during construction of BEP; no natural habitat or biological resources are present. On the south side of Hobson Way, from pole #9 through pole #25 (see Figures 2-4 and 2-5), a distance of approximately 2.4 miles, the proposed realignment moves the proposed line from the east side of the existing IID and Western transmission lines to the west of these two lines. The proposed realignment will cross abandoned jojoba fields (disturbed agriculture), ruderal vegetation and agricultural lands used for a vineyard.

Because this proposed change simply moves the centerline to the west into either an already disturbed/graveled area or within the environmental survey boundaries for the approved alignment in similar vegetation/habitat, the net impact to biological resources as a result of the proposed changes is expected to be negligible.

Biological surveys were conducted along the route of the proposed realignment which is within the area originally surveyed March through June 2004 for the transmission line (see Petition for Amendment Section 5.3.2.2 Survey Methods, and Petition Figure 5.3-3A). The alignment from milepost 0.0 to 3.0 does not contain any undisturbed desert habitats and no rare plants or special

status species were observed during the biological surveys. The Revised Staff Assessment (SA)/Draft Environmental Assessment (DEA) (CEC 2006a) noted the area between milepost 1 and 3 is agricultural land. Because the area traversed by the realignment was heavily cultivated or is used for a vineyard, potential impacts to biological resources would be comparable with the original alignment and no additional impacts are expected as a result of the proposed realignment.

Burrowing owl and Harwood's milk vetch are the sensitive species most likely to be encountered from milepost 0 to 3. As noted in the SA/DEA (CEC 2006s; page 4.2-20) Blythe Energy will implement mitigation measures to decrease the likelihood of direct or indirect impacts to burrowing owls, and has provided mitigation to compensate for the temporary impact to Harwood's milk vetch habitat. Since the milk vetch is found prolifically in this area during good rain seasons, and since it thrives in disturbed soil, there will be no permanent impact on the population of Harwood's milk vetch in the area.

Alignment from Milepost 6.5 to 60.2
Because this proposed change simply moves the centerline 35 ft to north within the environmental survey boundaries for the approved alignment in what is essentially identical vegetation/habitat, the net impact to biological resources as a result of the proposed changes is expected to be negligible.

Pedestrian transects were completed for the entire length of BTP consistent with the USFWS protocol desert tortoise (*Gopherus agassizii*) transects, from May 2 to 17, 2005. One-hundred percent of the BTP 95-foot ROW was surveyed using parallel, 30-foot-wide belt transects. The proposed new pole locations are within the original 95 foot wide ROW which received the 100% survey. The biological surveys documented the location and types of habitats and all occurrences of sensitive species.

Stub access roads extending to each pole from the existing SCE access road will be 35 feet longer at some locations, and 35 feet shorter where the natural gas pipeline access road is used for construction access. Because movement and "micro-siting" of poles is expected, Condition BIO-17 is specifically intended to determine the final disturbance caused by the project using a "Protocol for Disturbance Calculation and Compensation" (CEC 2006a, page 4.2-25).

5.3 Cultural Resources

Impacts to cultural from the project as modified with the proposed changes would be essentially the same as the impacts associated with the project as currently approved. Therefore, the proposed changes would not cause any new cultural resource impacts above and beyond those already identified and mitigated for in the existing CEC Decision and conditions of certification. No changes to or deletions of any cultural resources conditions of certification are required.

Previous reports, inventories, and evaluations of cultural resources in the project area were reviewed, and record searches and intensive surveys have been conducted for an Area of Potential

Effects (APE) that include the proposed transmission line realignment and the proposed new switchyard area located on the BEP site.

BEP Switchyard/Connection to BEP

The switchyard area is within the BEP site and was examined during the BEP Certification process (CEC 2001). Intensive surveys were conducted for the entire power plant site (CEC 2000, page 129). CEC Staff (CEC 2000, page 141) concluded that the type of identified cultural resources indicates that project construction is unlikely to encounter significant cultural resources. Because there is a remote chance that significant resources could be discovered by construction activities, implementation of the existing Conditions of Certification will ensure that the project will comply with applicable laws, ordinances, regulations, and standards, and no significant adverse direct, indirect, or cumulative impacts to cultural resources will occur.

The proposed new switchyard site was graded and graveled during the construction for BEP and no cultural resources are expected at that location. In addition to other mitigation measures, the Conditions of Certification require that ground disturbance be monitored as necessary to ensure there are no impacts to undiscovered cultural resources (CUL-19; CEC 2006a, page 4.3-37). Implementation of the Conditions of Certification will ensure that significant impacts to cultural resources from construction of the switchyard facility will be avoided.

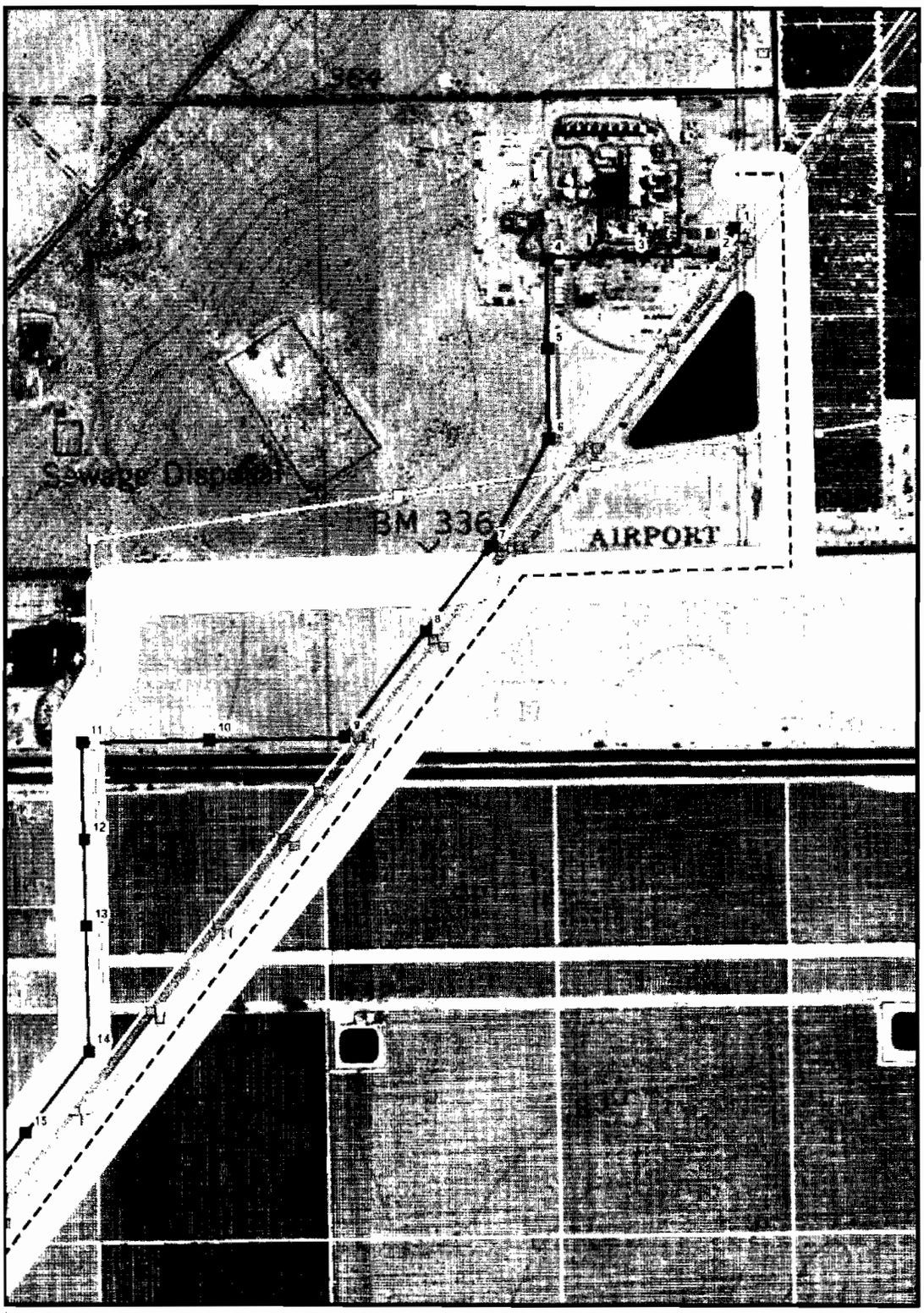
Alignment from Milepost 0.0 to 3.0

The proposed realignment is on the west side of the existing IID and Western transmission lines and crosses the BEP site, abandoned jojoba fields (disturbed agriculture), ruderal vegetation and agricultural lands used for a vineyard. With the exception of poles #8, 9, and 10 which are located on abandoned agricultural lands, the proposed realignment is within the APE examined in the100% cultural resources analysis conducted by Mooney, Jones & Stokes in 2005 (Figures 5-2 and 5-3). The location of all known cultural resources along and nearby the proposed realignment is included in the cultural resources inventory submitted for the project (Mooney, Jones & Stokes 2005).

South of Hobson Way the proposed relocated transmission line is adjacent to one recorded resource: the IID Niland-Blythe 161 kV transmission line (CA-Riv-7127H) a historic structure determined to not meet the minimum eligibility requirements for either the NRHP or the CRHR under any of the criteria (CEC 2006a, page 4.3-27). The proposed realignment from milepost 0 to 3.0 would avoid crossing the IID Niland-Blythe 161 kV transmission line and would not change the impact of the proposed project or have a significant adverse impact on cultural resources. Figure 5-4, submitted under separate cover with a request for confidentiality, provides the locations of cultural resources from milepost 0 to 3.0. None of these resources, including the WWII era refuse piles located at the northwest corner of the BEP site, would be impacted by the proposed realignment.

Alignment from Milepost 6.5 to 60.2

Blythe Energy conducted intensive surveys for 100% of this alignment in January and February, 2005. A final inventory report was provided in July, 2005 (Mooney, Jones & Stokes 2005). The survey areas were defined as a 300-foot-wide corridor for the transmission line, a 100-foot-wide



Legend

- Proposed BlyThe E-Line Pole Locations
- Proposed BlyThe E-Line Alignment
- Eagle Mountain E-Line
- BIE-WAPA E-Lines
- Approved BlyThe E-Line
- 300 ft APE Survey Area

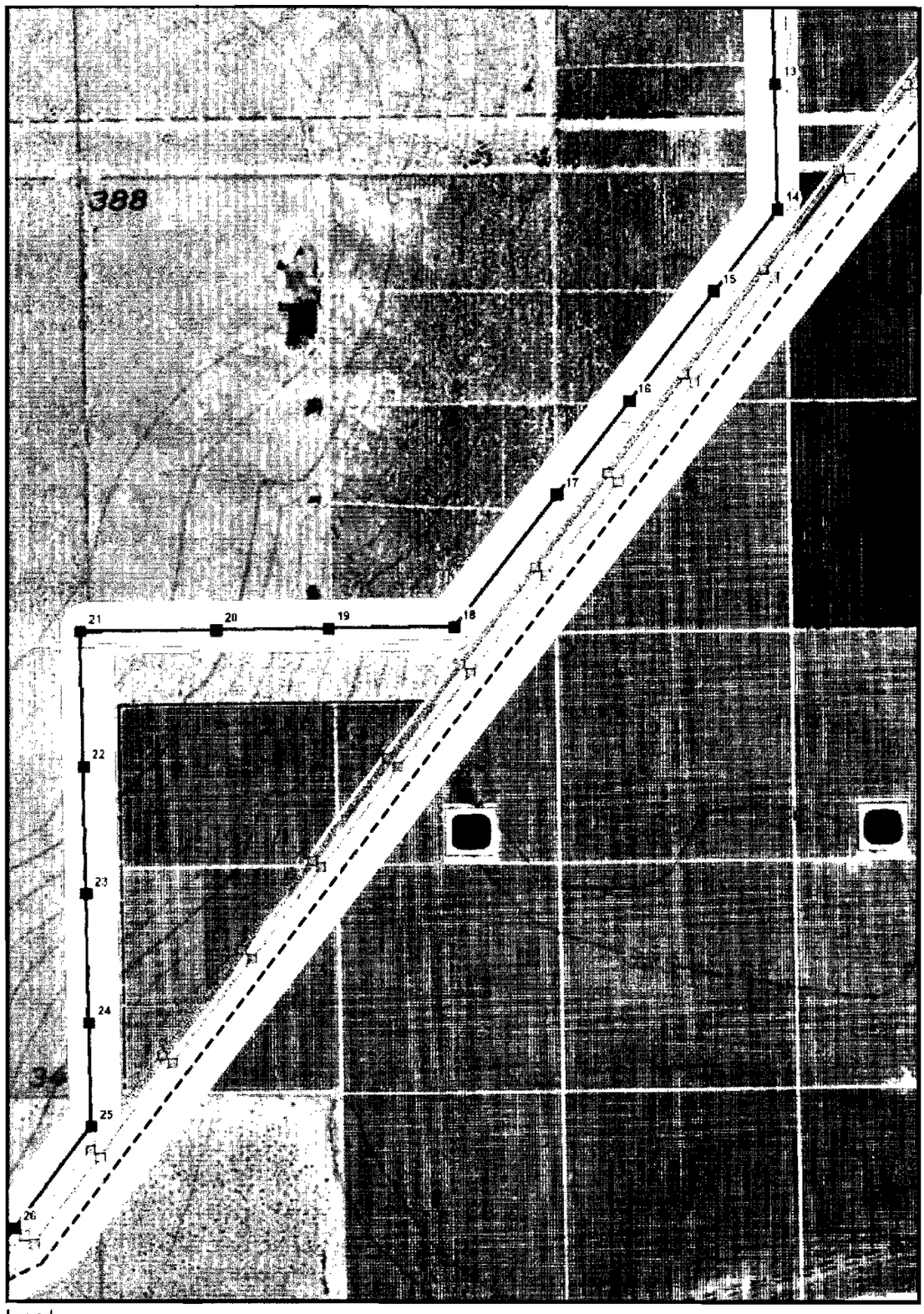
0 250 500 1,000 Feet

0 0.1 0.2 Miles

Blythe Energy Transmission Line

Blythe Energy, LLC

Figure 5-2 APE for Cultural Surveys



Legend

- Proposed Blythe 1 Line Pole Locations
- Proposed Blythe 1-Line Alignment
- Eagle Mountain 1-Line
- IID-WAPA 1-Lines
- Approved Blythe 1-Line
- 900 ft APE Survey Area

N

0 250 500 1,000 Feet

0 0.1 0.2 Miles

Blythe Energy Transmission Line

Blythe Energy, LLC

Figure 5-3 APE for Cultural Surveys

corridor for all access and spur roads, and the foot print and a 200-foot buffer in all directions from the perimeter of the footprint of substations, staging areas, and other project components. In addition, any sensitive resources within one-quarter mile, for which setting is an important aspect of the integrity of the resource, are also considered to be within the APE. The proposed realignment in this stretch of the transmission line would not impact any new cultural resources.

The cultural resources (excluding isolates) observed or recorded within the survey area were summarized in the CEC Staff Assessment/ Environmental Assessment (CEC 2006a; Table 2 on Page 4.3-14). Restrictive fencing, monitoring, and/or micro-siting of pole or road placement are measures used to ensure avoidance so that an evaluation of the resource is not required as summarized by CEC Staff (CEC 2006a; Table 4 on Page 4.3-21). These measures are still appropriate for those poles which will be relocated 35 feet to the north and, when implemented, the proposed modifications would not change the impact of the proposed project or have a significant adverse impact on cultural resources. In addition to other mitigation measures, the Conditions of Certification require that ground disturbance be monitored to ensure there are no impacts to undiscovered cultural resources (CUL-19; CEC 2006a, page 4.3-37).

5.4 Geology and Paleontology

Literature and archival reviews conducted for the approved project did not provide evidence of any paleontological resources that would be impacted by the Project. Because the proposed changes involve only minor facility relocations, they would not cause any new geological or paleontological impacts above and beyond those already identified and mitigated for in the existing CEC Decision and Conditions of Certification. No changes to or deletions of any geological or paleontological resource conditions of certification are required.

5.5 Hazardous Materials Management

The proposed modifications would not change the impact that the project would have on hazardous materials management.

5.6 Land Use

Impacts to land use from the project as modified with the three proposed changes would be essentially the same as *or less than* the impacts associated with the project as currently approved (less impact on agricultural lands). Therefore, the proposed changes would not cause any new land use impacts above and beyond those already identified and mitigated for in the existing CEC Decision and Conditions of Certification. No changes to or deletions of any land use conditions of certification are required.

Figures 2-4 and 2-5 illustrate the original and proposed realignment from milepost 0.0 to 3.0. The realigned portion is from pole #1 to pole #25, a distance of approximately 3.0 miles. The alignment is now adjacent to, and on the west side of the existing IID and Western transmission lines along this portion of the route.

North of Hobson Way, the re-aligned route is now located on BEP property, except for a short portion on the corner of the proposed BEP II property, as illustrated in Figure 2-4. From Hobson Way to I-10, the transmission line crosses abandoned agricultural lands, similar to the previously approved route. South of I-10, the re-aligned route crosses lands previously cultivated with jojoba and agricultural lands used for a vineyard. Within the vineyard, poles are located on vineyard access roads (Figure 5-5) and will not disturb agricultural activities. Overall, the proposed realignment crosses approximately 4410 feet of agricultural lands (vineyard) in comparison with the 8134 feet of agricultural lands (citrus) crossed by the approved route.

The irrigated agricultural lands are considered Prime Farmland by the California Department of Conservation. The proposed realignment will reduce the amount of irrigated land that will be converted from agricultural use. The revised alignment has been requested by the property owner and will minimize interference with the ongoing citrus grove activities and result in reduced impacts to agricultural lands located south of I-10.

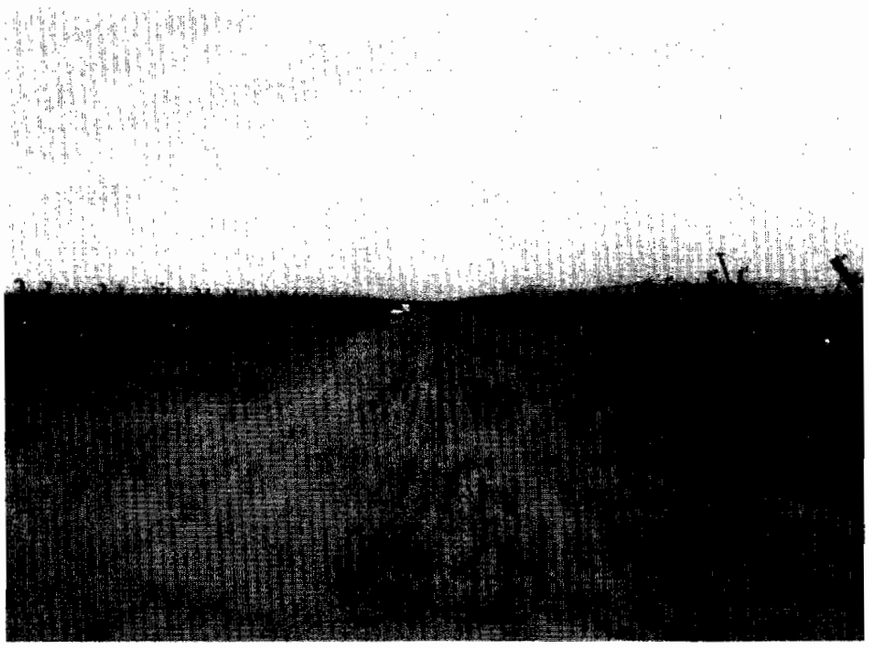


Figure 5-5. Agricultural access road within the vineyard.

At the November 10, 2004, Informational Hearing and Site Visit, the Airport Manager/ Assistant City Manager for the City of Blythe was concerned that the height and original location of the nearest transmission line structures in the vicinity of the airport could potentially create a flight path problem and affect further airport development as described within the Airport Master Plan. The nearest pole was originally 2930 feet from the airport runway (Blythe Energy 2004). For the proposed realignment all of the poles are more distant (4297 feet at the closest) and the tallest pole (150 feet) is pole #6, which is located approximately 5644 feet from the end of the Blythe

Airport east-west runway (see Figure 2-4). The pole heights and locations for the proposed realignment were reviewed by the Airport Manager/ Assistant City Manager for the City of Blythe during a meeting on April 11, 2007 (R. Holt, personal communication). Blythe Energy has submitted the Federal Aviation Administration (FAA) Form 7460-1 Notice of Proposed Construction or Alteration for the pole locations closest to the airport and will submit the results of the FAA review to the CEC when it is received.

5.7 Noise and Vibration

The proposed modifications would not change the noise impact of the project. The proposed modifications are located almost entirely in areas that have no permanent residents and few activities that generate substantial sustained noise events.

5.8 Public Health

The proposed modifications would not change the impact the project would have on public health.

5.9 Socioeconomics

The proposed modifications would not change the impact the project would have on socioeconomics or on schools, housing, law enforcement, emergency services, hospitals, or utilities.

5.10 Soil and Water Resources

The proposed modifications would not change the impact the project would have on soil and water resources. The new switchyard location is on a level graveled surface adjacent to the approved location. The realigned transmission line from milepost 0.0 to 3.0 crosses abandoned agricultural lands or citrus groves similar to the previously approved route. These areas are almost level with no natural drainage patterns.

5.11 Traffic and Transportation

The proposed modifications would not change the impact the project would have on traffic and transportation. Road access will be identical to the approved project and the proposed modifications will not cause any changes to construction or operation traffic.

5.12 Visual Resources

The proposed modifications would not change the impact the project would have on visual resources.

The proposed relocated switchyard would be located within the BEP project site and have a substantially smaller site layout compared to the approved substation (see Figures 2-4 and 2-5). The switchyard location is adjacent to the approved location and would not change the visual impact of the proposed project.

The relocated transmission line would cross I-10 at the location illustrated in Figure 5-6 (from Petition Figures 5.9-2a and 5.9-2b for KOP 1; Blythe Energy 2004). At the I-10 crossing, the

proposed realignment would be adjacent to existing SCE Eagle Mountain 161 kV transmission line in the same location as proposed in the original Petition (Blythe Energy 2004) and reviewed by CEC Staff (CEC 2006a, KOP1 on page 4.11-10). The poles and conductors at the transmission line crossing of I-10 would be clearly visible from this viewpoint, but would blend in with other transmission line crossings in the foreground/middle ground view.

Figure 5-6. Visual simulation of transmission line crossing of I-10.

Where the pole realignment would occur from MP 6.0 to MP 60.2, the proposed realignment of 35 feet to the north would not be evident from any of the viewpoints analyzed during the certification process.

5.13 Waste Management

Waste management during the construction and operation would not change as a result of the proposed modifications.

5.14 Worker Safety and Fire Protection

Construction and operation of the proposed modifications would not change the impact the project would have to worker safety or cause a change in fire hazard.

6.0 Ability to Comply With LORS

The proposed project modifications are minor and are consistent with all applicable LORS. The findings and conclusions contained in the Commission Decision for BEP (CEC 2001) and the Blythe Transmission Line (CEC 2006b) are still applicable to the

project as modified. The proposed modifications will not require any changes to the Conditions of Certification.

7.0 Potential Effects on the Public

Construction and operation of the proposed modifications would not change the impact of the proposed project or have a significant adverse impact to the public.

8.0 List of Property Owners

Appendix D provides a list of all property owners whose property is located within 1000 feet of the proposed project modifications in accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769[a][1][H]).

9.0 Potential Effects on Property Owners

The relocated switchyard is entirely on BEP property and will have no effect on surrounding property owners.

South of I-10, the re-aligned route crosses abandoned agricultural lands previously cultivated with jojoba and agricultural lands used for a vineyard. Within the vineyard, poles are located on vineyard access roads and will not disturb agricultural activities. Overall, the proposed realignment crosses approximately 4410 feet of agricultural lands (vineyard) in comparison with the 8134 feet of agricultural lands (citrus) crossed by the approved route. The revised alignment has been requested by the property owner and will minimize interference with the ongoing citrus grove activities and result in reduced impacts to agricultural lands located south of I-10.

Adjustments to the pole locations from Milepost 6.5 to 60.2 will have no effect on property owners along the alignment. There are no private or BLM structures, homes, businesses, or other similar land uses along the ROW. The ROW width of 95 feet is unchanged. On private lands the ROW will be adjacent to SCE ROW as was originally planned. On BLM lands the ROW will be 35 feet to the north of the SCE ROW in order for the BTP ROW to run straight when changing from private to BLM lands.

10.0 References Cited

ASM Affiliates. 2002. A Class II Cultural Resources Assessment for the Desert-Southwest Transmission Line, Colorado Desert, Riverside and Imperial Counties, California. Volumes I and II.

Blythe Energy 2004. Petition for Post-Certification Amendment (99-AFC-8).

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Mooney/Hayes Associates. 2004. Preliminary Cultural Resources Survey of the Proposed Blythe Energy Transmission Line Project, Riverside County, California

Mooney, Jones & Stokes (MJ&S). 2005. Draft Cultural Recourse Inventory of the Proposed Blythe Energy Transmission Project. Submitted to the Docket on June 14, 2005.

Western & BLM. 2007. Finding of No Significant Impact and Floodplain Statement of Findings – Blythe Energy Project Transmission Line Modifications Project, Riverside County, California. Western/DOE EA-1522.

Appendix A

CAISO Interconnection Approval of FPLE's Blythe-Julian Hinds 230kV Generation Interconnection

California ISO

California Independent
System Operator

Gary DeShazo
Director of Regional Transmission
(916) 608-5880

February 9, 2007

Mr. John Tucker
Manager – Program/Contracts
T&D – Federal Regulation and Contracts
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Subject: Interconnection Approval of FPLE's Blythe – Julian Hinds 230kV Generation Interconnection

Dear Mr. Tucker:

The California ISO (CAISO) has reviewed the Revised Facilities Study (FAS), performed by Southern California Edison (SCE), for the proposed connection of 520 MW from the Blythe Energy Project 1 (the Project). Blythe Energy, LLC (Blythe), a subsidiary of FPL Energy (FPLE), is the sponsor of the Project. The study was revised to reflect the revised configuration of the Project to connect to the CAISO-controlled Julian Hinds Substation. Previously the Project was proposed to connect to WAPA's Buck Blvd. Substation, with construction of a new 230kV line from Buck Blvd. to Julian Hinds Substation. On November 20, 2006, Blythe confirmed with SCE in its request to re-configure the proposed Buck Blvd. – Julian Hinds 230kV transmission line project to eliminate the previously proposed interconnection to WAPA's Buck Blvd. Substation and instead connect directly to the CAISO-controlled grid at Julian Substation via a new 67.4-mile 230kV transmission line from Blythe to Julian Hinds Substation. The Blythe – Julian Hinds 230kV Generation Tie Line (Tie Line) will be owned by Blythe. SCE has estimated that the earliest possible operating date for this Project is third to fourth quarter of 2008.

Based on the proposed transmission plan of service specified in the FAS, the CAISO is granting interconnection approval to the Project, subject to the successful completion of the identified upgrades and mitigation measures. Please refer to Attachment A to this letter for more details about the Project and approval conditions.

Please note that this letter approving the interconnection of the project allows the project to connect to the CAISO Controlled Grid and deliver the project's output using as-available transmission. However, it does not establish the Project's level of deliverability for purposes of determining Net Qualifying Capacity under the CAISO. Therefore, this letter makes no representation, and the Project cannot rely on any statements herein, regarding the ability, or amount, of the output of the Project to be eligible to sell Resource Adequacy Capacity. We encourage the Project Applicant to follow the baseline deliverability studies ongoing at the CAISO. For more information on generation deliverability, please reference the web links provided in the attachment of this letter.

If you have questions about the CAISO review of this study, please contact David Le at (916) 608-7302 (DLe@caiso.com) or me at (916) 608-5880 (GDeShazo@caiso.com).

Sincerely,

Original signed by Gary DeShazo

Gary DeShazo
Director of Regional Transmission cc:

via e-mail:

Gary L. Palo (Gary_L_Palo@fpl.com)
Juan R. Villar (Juan_R_Villar@fpl.com)
Mark J. Smith (Mark_J_Smith@fpl.com)

Mark Hesters (MHesters@energy.state.ca.us)

Gary Tarplee, (SCE, Gary.Tarplee@sce.com)
Pat Arons (SCE, Patricia.Arons@sce.com)
Robert Lugo (SCE, Robert.Lugo@sce.com)
John Tucker (SCE, John.Tucker@sce.com)
Dana Cabbell (SCE, Dana.Cabbell@sce.com)
David Franklin (SCE, David.Franklin@sce.com)
Kevin Cini (SCE, Kevin.cini@sce.com)
Jill Horswell (SCE, jill.horsell@sce.com)

CAISO via e-mail
Armando Perez (APerez@caiso.com)
Gary DeShazo (GDeShazo@caiso.com)
Stephen Rutty (Srutty@caiso.com)
Judy Nickel (JNickel@caiso.com)
Jacqueline DeRosa (JDeRosa@caiso.com)
Dennis Peters (DPeters@caiso.com)
David Le (DLe@caiso.com)
Regional Transmission – North & South

Attachment A

CAISO Review of Revised Facilities Study of the Blythe – Julian Hinds 230kV Generation Interconnection Project

This attachment provides a summary of the project, along with CAISO comments.

Project Overview

The proposed **Blythe – Julian Hinds 230kV Generation Interconnection Project** (the "Project") is located in Riverside County, California. Blythe Energy (Blythe), a subsidiary of FPL Energy (FPLE), proposed to connect the existing Blythe Energy Project I (BEP I), a 520 MW combined-cycle plant in Blythe, CA, to the CAISO-controlled facility at Julian Hinds Substation via a new 67-mile 230kV transmission line connecting Blythe to Julian Substation. The BEP I has been on-line since July 2003, but was connected to Western Area Power Administration (Western)'s system at Buck Blvd Substation. This Project will change the point of interconnection from Western's Buck Blvd Substation to CAISO-controlled grid at Julian Hinds Substation. The Project's operational date is estimated to be **third or fourth quarter of 2008**. The permitting of this Project has been granted approval by the California Energy Commission (CEC) in October, 2006 (Docket No. 99-AFC-8C). Figure 1 shows the connection of the Project (dashed line) to Julian Hinds Substation.

Blythe – Julian Hinds 230kV Generation Interconnection Project

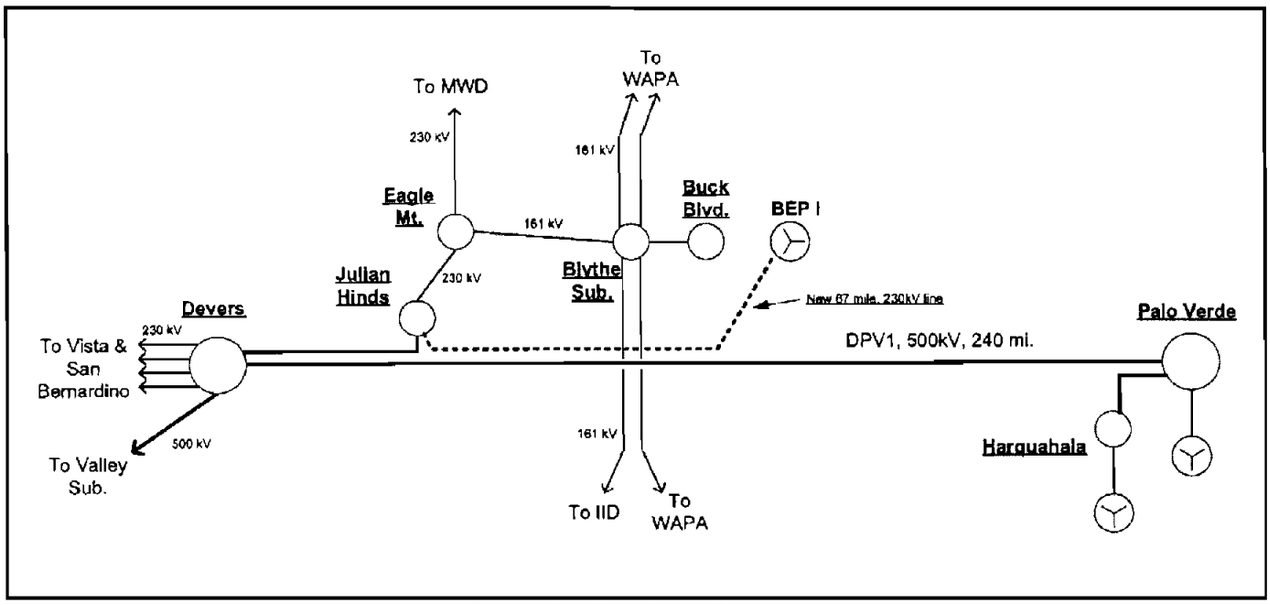

Figure 1: One-Line Diagram

Project History

The Project has previously been referred to as Buck Blvd. – Julian Hinds 230kV Transmission Line Project. The Project was originally a transmission project with the proposed new 230kV line connecting Western's Buck Blvd Substation to CAISO-controlled facility at Julian Hinds Substation. The CAISO reviewed and provided preliminary approval to this Project on May 6, 2005. A Facilities Study, with the old configuration of Buck Blvd – Julian Hinds 230kV line, was prepared and completed by SCE in April 2006. Subsequently, Blythe informed SCE on September 29, 2006, that it was considering re-configuration of the Project to terminate from Blythe to Julian Hinds Substation to have a direct generation interconnection to the CAISO-controlled grid. SCE and the CAISO have determined that this change would not constitute a material modification, which means that it would not cause any impact to the other projects in lower queue. This Project's queue position stayed with SCE's queue listing.

Summary of the Study Results

Revised Facilities Study

The Revised Facilities Study included evaluation of six different plans of service for connecting the BEP I to Julian Hinds Substation (Options A – F). Blythe has asked the CAISO to provide comments and approval specifically to the plan of service for Option A. Blythe has concurred on the proposed plan of service associated with **Option A**. On other plans for other Options, Blythe has not made any commitment, but has mentioned that it would consider as options during the Large Generator Interconnection Agreement (LGIA) review process. The following upgrades are **common** to all of these six plans of service associated with Options A - F:

- Install a new line position at Julian Hinds Substation to terminate the new Blythe – Julian Hinds 230kV line.
- Install a new 230kV circuit breaker at Mirage Substation where the Julian Hinds – Mirage 230kV line terminates. This installation is needed for the upgrade of the North Bus Differential Protection Scheme.
- Install SPS-102 to eliminate the N-1 overload on the Coachela – Devers 230kV line under the loss of the Devers – Mirage 230kV line by tripping 520 MW at Blythe plant.
- Install SPS-103 to eliminate N-1 overload on the Eagle Mountain – Julian Hinds 230kV line under the loss of the Julian Hinds – Mirage 230kV line by tripping 175 MW at Blythe plant.
- Install SPS-104 to eliminate N-1 overload on the Camino – Iron Mountain 230kV line under the loss of the Julian Hinds – Mirage 230kV line by tripping 60 MW at Blythe plant.
- Install new Remote Terminal Unit (RTU) at Blythe plant and replace the existing RTU at Julian Hinds Substation. Add points to the existing RTU's at Mirage Substation.
- Install dual telecommunication circuits between Buck Blvd. and Julian Hinds.
- Install dual telecommunication circuits from Devers to Mirage, Julian Hinds and Buck Blvd. to support new SPS's 102, 103 and 104 relays.
- Install telecommunication circuits between Mirage and Blythe plant.

- Upgrade the West of Devers 230kV lines and associated terminal equipment. This upgrade has been considered to be part of SCE Transmission Plan to address the long-term upgrade need for the West of Devers 230kV lines.

Table 1 is the summary of required SPS's for Options A – F:

Table 1 – Summary of SPS Requirements

Option	Required SPS	Protected Transmission Line	Monitored Contingencies	Amount of Generation Curtailment	Comments
Common for All Options	SPS-102	Coachella – Devers 230kV	N-1: Devers – Mirage 230kV	520 MW	Meet ISO G4 & G7 SPS Guidelines
	SPS-103	Eagle Mountain – Julian Hinds 230kV	N-1: Julian Hinds – Mirage 230kV	175 MW	Meet ISO G4 & G7 SPS Guidelines
	SPS-104	Camino – Iron Mountain 230kV	N-1: Julian Hinds – Mirage 230kV	60 MW	Meet ISO G4 & G7 SPS Guidelines
A	Additional SPS-0	Julian Hinds – Mirage 230kV	Normal conditions (SPS will curtail generation if line is overloaded under all lines in service)	180 MW	Meet ISO G4 & G7 SPS Guidelines
	SPS-1	Julian Hinds – Mirage 230kV	N-1: Eagle Moutain – Julian Hinds 230kV, OR N-2: Mirage-Ramon & Coachella – Devers 230kV	520 MW	Meet ISO G4 & G7 SPS Guidelines
	SPS-2	Devers – Mirage 230kV	N-1: Devers – Palo Verde 500kV OR Coachella – Devers 230kV	520 MW	Meet ISO G4 & G7 SPS Guidelines
B	Additional SPS-101	Julian Hinds – Mirage 230kV	N-1: Eagle Mountain – Julian Hinds 230kV	60 MW	Meet ISO G4 & G7 SPS Guidelines
	SPS-2	See SPS-2 above			
C	Additional SPS-2	See SPS-2 above			
D	Additional SPS-0	See SPS-0 above			
	SPS-1	See SPS-1 above			
E	Additional SPS-101	See SPS-101 above			
F	No Additional SPS's	None			

The following are descriptions of facility upgrades needed for each of the plan of service for Options A – F (Options A – F are different transmission alternatives for connecting the Blythe I generation plant to Julian Hinds Substation):

1) **OPTION A**

- Upgrade Julian Hinds – Mirage 230kV line to restore to 895-Amp (356.5 MVA) rating by intersetting structures at six locations to eliminate the line to ground clearance problems
- Install Special Protection System as follows (for more details, see Table 1):
  - SPS-0, SPS-1, and SPS-2
- Install additional dual telecommunication circuits from Mirage to Blythe plant
- If the projects ahead of this Project dropped off from the queue position, then replacement of the following circuit breakers may be required (a short-circuit study will need to be re-studied to determine at that time): replace nine 40kA 230kV circuit breakers at Devers Substation with new 50kA rating and upgrade two 40kA to 50kA rating, if required.

2) **OPTION B**

- Re-build the Julian Hinds – Mirage 230kV line with 1033 kcmil
- Install Special Protection System as follows (for more details, see Table 1):
  - SPS-101 and SPS-2
- Upgrade the existing Julian Hinds – Mirage 230kV line from 595 A to 1240 A rating by rebuilding 46.8 miles of line and replacing with 1033 kcmil ACSR conductor
- Replace two 1200 A disconnect switches and one 1200 A wave trap for the Julian Hinds – Mirage 230kV line at Julian Hinds substation with new 3000 A equipment
- Install dual telecommunication circuits from Devers to Coachella, Eagle Mountain and Palo Verde Substations to support new SPS's
- Acquire new Righs of Way (R/W) for rebuilding of the Julian Hinds – Mirage 230kV line
- If the projects ahead of this Project dropped off from the queue position, then replacement of the following circuit breakers may be required (a short-circuit study will need to be re-studied to determine at that time): replace nine 40kA 230kV circuit breakers at Devers Substation with new 50kA rating and upgrade two 40kA to 50kA rating, if required.

3) **OPTION C**

- Re-build the Julian Hinds – Mirage 230kV line with 2-1033 kcmil
- Install Special Protection System as follows (for more details, see Table 1):
  - SPS-2

- Upgrade the existing Julian Hinds – Mirage 230kV line from 595 A to 2480 A rating by rebuilding 46.8 miles of line and replacing with 2-1033 kcmil ACSR conductor

- Replace two 1200 A disconnect switches and one 1200 A wave trap for the Julian Hinds – Mirage 230kV line at Julian Hinds substation with new 3000 A equipment

- Replace three 2000 A disconnect switches the Julian Hinds – Mirage 230kV line at Mirage substation with new 3000 A equipment

- Install dual telecommunication circuits from Devers to Coachella and Palo Verde Substations to support new SPS's

- Acquire new Righs of Way (R/W) for rebuilding of the Julian Hinds – Mirage 230kV line

- If the projects ahead of this Project dropped off from the queue position, then replacement of the following circuit breakers may be required (a short-circuit study will need to be re-studied to determine at that time):

    - Replace nine 40kA 230kV circuit breakers at Devers Substation with new 50kA rating and upgrade two 40kA to 50kA rating, if required,

    - Replace two 45.6kA 230kV circuit breakers at Lewis Substation, if required

4) <u>OPTION D</u>

- Upgrade Julian Hinds – Mirage 230kV line to restore to 895-Amp (356.5 MVA) rating by intersetting structures at six locations to eliminate the line to ground clearance problems

- Install Special Protection System as follows (for more details, see Table 1):

    - SPS-0 and SPS-1

- Upgrade the existing Devers – Mirage 230kV line from 1240 A to 2480 A rating by replacing 15.2 miles of line with 2-1033 kcmil ACSR conductors

- Replace associated terminal equipment for the Devers – Mirage 230kV line to accommodate the above upgrade

- Replace three 2000 A disconnect switches the Julian Hinds – Mirage 230kV line at Mirage substation with new 3000 A equipment

- If the projects ahead of this Project dropped off from the queue position, then replacement of the following circuit breakers may be required (a short-circuit study will need to be re-studied to determine at that time):

    - Replace nine 40kA 230kV circuit breakers at Devers Substation with new 50kA rating and upgrade two 40kA to 50kA rating, if required,

    - Replace two 45.6kA 230kV circuit breakers at Lewis Substation, if required

5) <u>OPTION E</u>

- Re-build the Julian Hinds – Mirage 230kV line with 1033 kcmil
- Upgrade the Devers – Mirage 230kV line to 2-1033 kcmil
- Install Special Protection System as follows (for more details, see Table 1):
  - SPS-101
- Upgrade the existing Julian Hinds – Mirage 230kV line from 595 A to 1240 A rating by rebuilding 46.8 miles of line and replacing with 1033 kcmil ACSR conductor
- Replace associated terminal equipment for the Julian Hinds – Mirage 230kV line
- Replace associated terminal equipment for the Devers – Mirage 230kV line
- Install dual telecommunication circuits from Devers to Eagle Mountain Substations to support new SPS
- Acquire new Righs of Way (R/W) for rebuilding of the Julian Hinds – Mirage 230kV line
- If the projects ahead of this Project dropped off from the queue position, then replacement of the following circuit breakers may be required (a short-circuit study will need to be re-studied to determine at that time): replace nine 40kA 230kV circuit breakers at Devers Substation with new 50kA rating and upgrade two 40kA to 50kA rating, if required.

6) **OPTION F**

- Re-build the Julian Hinds – Mirage 230kV line with 2-1033 kcmil
- Upgrade the Devers – Mirage 230kV line to 2-1033 kcmil
- Replace associated terminal equipment for the Julian Hinds – Mirage 230kV line
- Replace associated terminal equipment for the Devers – Mirage 230kV line
- Acquire new Righs of Way (R/W) for rebuilding of the Julian Hinds – Mirage 230kV line
- If the projects ahead of this Project dropped off from the queue position, then replacement of the following circuit breakers may be required (a short-circuit study will need to be re-studied to determine at that time):
  - Replace nine 40kA 230kV circuit breakers at Devers Substation with new 50kA rating and upgrade two 40kA to 50kA rating, if required,
  - Replace two 45.6kA 230kV circuit breakers at Lewis Substation, if required

CAISO Comments

The CAISO has the following comments:

1. The SPS-0, proposed to mitigate line overloading under normal (all lines in service) conditions by curtailing BEP I generation if the Julian Hinds – Mirage 230kV is overloaded, is acceptable as long as BEP I is the only generating facility that contributes to this overload. It is the CAISO understanding that Blythe concurred with this proposed mitigation and this agreement will be reflected in the LGIA (Large Generator Interconnection Agreement) and the PPA (Power Purchase Agreement). If there are future generation interconnection projects that could potentially contributes to the Julian Hinds – Mirage 230kV line overloading, the SPS-0 will need to be modified to include other generation, subject to conformance with the ISO G4 & G7 Guidelines. In the event that the modified SPS does not meet ISO SPS Guidelines at that time, system upgrade or implementation of MRTU Day-Ahead congestion mitigation protocol is required. For more details on the ISO SPS Guidelines, see the following link:

   http://www.caiso.com/docs/09003a6080/14/37/09003a608014374a.pdf

2. Blythe asked the CAISO to provide comments and approval on Option A, which is the least cost alternative ($12.339 million)[1]. Although Option A does not violate any reliability criteria or SPS Guidelines, the CAISO would encourage Blythe to consider other options to eliminate the need of the SPS-0 during the LGIA process with CAISO and SCE. Options that would eliminate the need for the SPS-0 are Options B, C, E and F.

Based on the results of the Revised Facilities Study, the CAISO is granting interconnection approval to the Project for Option A, per Blythe's request, subject to the conditions discussed in the Comment #1 above.

Please note that this letter approving the interconnection of the project allows the project to connect to the CAISO Controlled Grid and to be eligible to deliver the project's output using **available** transmission. However, it does not establish the generation project's level of deliverability for purposes of determining its Net Qualifying Capacity under the CAISO Tariff and in accordance with CPUC-adopted Resource Adequacy Rules. Therefore, this letter makes no representation, and the Interconnection Customer cannot rely on any statements herein, regarding the ability, or amount, of the output of the project to be eligible to sell Resource Adequacy Capacity.

We encourage you to follow the baseline deliverability studies ongoing at the CAISO. For more information on generation deliverability, please reference the following web links: http://www.caiso.com/181c/181c902120c80.html

[1] Maximum cost exposure could include additional $105.9 million for West of Devers upgrades and circuit breaker replacement at Devers Substation if higher-queued projects drop out.

Appendix B

Southern California Edison Company Facilities Study – Rev 1 – Blythe-Julian Hinds 230kV Generation Interconnection (Formerly Buck Blvd.-Julian Hinds Transmission Line)

(Confidential: Submitted under separate cover with a request for confidentiality).

Appendix C

SCE Announcement

SCE Signs Long-Term Power Contracts in its Continuing Effort to Attract New Generation to Southern California

Change text size.
February 16, 2007

Corporate Communications
(626) 302-2255

ROSEMEAD, Calif., Feb. 16, 2007—Southern California Edison (SCE) today announced the winning bidders in its competitive solicitation for long-term contracts leading to new power generation to serve Southern California's growing energy needs.

The power-purchase agreements with two companies will provide Southern California with 945 megawatts (MW) of new generating capacity - enough power to serve 614,000 average homes. The contracts will be submitted to the California Public Utilities Commission (CPUC) for review and approval.

Winning Bidders

Project Developer	*Location*	*Type*	*Length*	*MW**
Blythe Energy	Blythe, CA	New transmission link connecting combined-cycle natural gas facility to Cal-ISO grid**	10 yrs.	490
Competitive Power Ventures	Coachella Valley, CA	Peakers using the new, lower-emission GE LMS 100 natural gas turbines	10 yrs.	455
Total				945

**One MW is enough power to serve 650 average homes at a point in time.*
***SCE's RFO included the option of bidding a transmission project that would connect an existing generation resource with a remaining design life of at least 30 years to the California Independent System Operator grid serving SCE's service territory.*

"Southern California needs additional new generating capacity because of rising demand and older power plants closing," said Alan Fohrer, SCE chief executive officer. "We congratulate the winning bidders for proposals that will provide customers with the greatest value."

SCE's new generation initiative was started in 2005 in response to

forecast future shortages of generation supply in the Southern California region of the electrical system overseen by the California Independent System Operator. On July 20, 2006, the CPUC approved SCE's plan for signing 10-year contracts with new generation projects with the benefits and costs of the contracts allocated to all customers within SCE's service territory who benefit from the enhanced reliability.

SCE then issued a request for offers (RFO) for up to 1,500 MW of new or repowered generating capacity. The request eventually provided the option to bid into one or more of three different "tracks," depending on when the bidder's project would be online.

"This unique procurement process allows us to sign contracts that benefit all customers on our distribution system, regardless of their choice of electric provider," said Pedro Pizarro, SCE senior vice president of power procurement. "It provides a transitional means to attract much needed new generation while a market framework is put in place that will provide new resources when needed."

The fastest of three solicitation tracks in SCE's new generation RFO was for projects that could be on-line by Aug. 1, 2007. SCE announced Nov. 16, 2006, the winning bidder in this track – Long Beach Generation, LLC, a subsidiary of NRG Energy Inc. (NYSE: NRG). Long Beach Generation received a 10-year power purchase agreement to provide 260 MW of new generating capacity to serve all customers on SCE's grid. Retired in January 2005, the plant will be refurbished and retrofitted with the latest emissions-control technology. The CPUC approved the contract with NRG late last month.

Today's announcement relates to the second track – new generating capacity that could be available by Aug. 1, 2010. A third track, for new facilities that could be operational by Aug. 1, 2013, is still underway and will conclude next year.

Background – SCE's Competitive Solicitation Process

SCE power purchase solicitations adhere to specific rules established by the CPUC to ensure the utility's power procurement process is open, fair, and transparent and delivers the greatest value possible to customers.

As the process begins, a public request for offers is widely distributed and solicitation information is posted on SCE's public access Web site. Independent power producers are encouraged to propose projects that will meet the future needs of SCE's customers outlined in the solicitation.

Bidder briefings are held to answer questions and provide information power producers need as they consider preparing contract proposals.

Contract bids are received and evaluated by SCE. A short list of the most attractive offers is selected and final negotiations occur. Winning bidders are chosen and contracts signed and submitted to the CPUC for review and approval. The CPUC issues its decision on whether the contracts serve the interests of customers on whose behalf the commitments have been made. In this case, the commission is expected to make its decision later this year.

During the course of the solicitation, an independent evaluator (IE) oversees the process, verifying that no preferential treatment is provided to any bidder. Additionally, SCE consults frequently with an independent procurement review group comprised of CPUC staff members and representatives of consumer, environmental and labor groups that are not market participants.

# # #

An Edison International (NYSE: EIX) company, Southern California Edison is one of the nation's largest electric utilities, serving a population of more than 13 million via 4.7 million customer accounts in a 50,000 square-mile service area within central, coastal and Southern California.

Appendix D

List of Property Owners within 1000 Feet. Affected by Project Change

List of Property Owners within 1000 Feet.
Affected by Project Change

APN	Owner's Name	Mailing Street Address	Mailing City / State / Zip
709-380-002	Moinfar Fairman & Taherch	26661 Las Tunas Dr	Mission Viejo Ca 92692-3934
709-380-003	Chance W M & Judith A	9619 Chesapeake Dr Ste 103	San Diego Ca 92123-1394
709-380-004	Wheelock George Richard	4506 Spruce Way Unit 1	Vail Co 81657-4788
709-380-005	Imperial Irrigation Dist	Po Box 937	Imperial Ca 92251-0937
709-380-006	Minas Caro J & Rebecca F	2537 Saint Andrews Dr	Glendale Ca 91206-1840
808-130-006	Golden Monkey Inc	Po Box 1910	Arcadia Ca 91077-1910
810-181-003	Elton Inc Retirement	1175 La Moree Rd Spc 109	San Marcos Ca 92078-4522
810-392-001	Casper Family Trust	490 Jasper Ct	Benicia Ca 94510-3929
811-052-005	Ursegay Mary & Marceline	57303 Pueblo Trl	Yucca Valley Ca 92284-3870
811-052-008	Kao Li Yu	179 Sec 3 Nan Kang Rd	Taipei Taiwan Roc
811-052-016	Baghjian Rafi & Sevan	7586 Woodrow Wilson Dr	Los Angeles Ca 90046-1325
811-052-019	Unk	PO BOX 1799	SACRAMENTO CA 95812-1799
811-072-001	Cohen Max	11002 Magnolia Blvd	North Hollywood Ca 91601-5648
811-072-002	Hird Urbane W & Jane G	2807 Ovean St Unit O-301	Carlsbad Ca 92008
811-072-011	Metropolitan Water Dist Of Soc	Po Box 54153	Los Angeles Ca 90054
824-090-009	Unk		
824-090-024	Cocopah Nurseries	81910 Arus Ave	Indio Ca 92201-7739
824-090-028	Ahmed Iqbal	4507 Wheeler Ave	Laverne Ca 91750
824-090-037	Dawson Ronald E & Rita D	16275 W Hobsonway	Blythe Ca 92225-2375
824-101-013	Caithness Blythe Ii	12463 Rch Bernardo Rd 400	San Diego Ca 92128
824-102-025	Sun World International Inc	Po Box 80298	Bakersfield Ca 93380-0298
860-100-002	Alford Sally T & John R	12085 Morrow Dr	Tustin Ca 92782-1266
860-100-003	Diebenkorn Phyllis G	4060 W Soda Rock Ln	Healdsburg Ca 95448-9631
860-100-004	Showers Suzanne	4050 Willowcrest Ave	Studio City Ca 91604-3443
860-100-022	Gold Capital Investment Corp	4251 Sweetwater Rd	Bonita Ca 91902-1415
860-140-005	Jones Frederick	8004 Clock Tower Ct	Las Vegas Nv 89117-1356
860-230-001	Overland Assoc Inc	Po Box 2143	Capistrano Beach Ca 92624-0143
860-230-002	Vanbebber J D & Lilia M	N/Avail	
863-020-015	Gosser Ben F & Ann A	2137 W 183rd St	Torrance Ca 90504-5402
863-030-009	Rivera Jesus M & Teresa L	288 E Budd St	Ontario Ca 91761-4203
863-040-017	Musetti Daniel K	27068 La Paz Rd No 203	Aliso Viejo Ca 92656
863-050-009	Hesselnberg Karin	Postfach 1328 4840 Rheda	Wiedenbruck West Germany
879-020-001	West Eldon J & Vera F	617 E Whitcomb Ave	Glendora Ca 91741-2740
879-020-002	Cittell Robert R & Lynda R	1750 Whittier Ave, Spc 13	Costa Mesa, Ca 92627
879-020-006	Switzky Sharon 2004 Trust	35690 Balsam St	Wildomar Ca 92595-8503
879-020-007	Switzky Renee	1534 Via Verde Ave	Palmdale Ca 93550-7313

879-020-008	Dessureaut Robert Laperle & Ma	4610 Oak Glen Way	Fair Oaks Ca 95628-6136
879-030-001	Gray Cheryl M		
879-030-002	Weining Ethel	16315 Village 16	Camarillo Ca 93012-7305
879-030-007	Helmand Robert B	170 S Main St Ste 575	Salt Lake City Ut 84101-1670
879-080-001	Ennis Sandra S & Florence I	30279 Ravenswood Cir	Murrieta Ca 92563-4808
879-080-015	Classis Of Calif	27420 Jefferson Ave Ste 201	Temecula Ca 92590-2668
879-080-028	Southern California Edison Co	Po Box 800	Rosemead Ca 91770
879-080-031	Nelson Richard E	Po Box 11765	Marina Del Rey Ca 90295-7765
879-100-004	Carmen Carroll	11950 Shepard Rd	Smartville Ca 95977
879-100-005	Acosta Juan & Aurora	15416 Clark Ave	Bellflower Ca 90706-3573
879-100-011	Youssefiha Majid	Po Box 3051	North Hollywood Ca 91609-0051
879-110-005	Miyasako George Joroshi & Mats	11530 Victoria Ave	Riverside Ca 92503-0812